UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In Re: Chapter 13

Denise D Woodlock-Miller

Bankruptcy No. 20-11251-AMC

Debtor

TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

- 1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
- 2. The within case was commenced by the filing of a Chapter 13 petition on 02/28/2020.
- 3. This Motion to Dismiss has been filed for the following reason(s):
 - There has been unreasonable delay as defined by 11 U.S.C Section 1307(c)(1) by the above-captioned Debtor(s).

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, requests that the Court, after a hearing, enter an Order dismissing this case.

Date: 07/06/2020 Respectfully submitted,

/s/ Polly A. Langdon, Esq.

Polly A. Langdon, Esq.

for

Scott F. Waterman, Esq.
Standing Chapter 13 Trusteee

2901 St. Lawrence Avenue, Suite 100

Reading, PA 19606

Telephone: (610) 779-1313